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12 AMGUARD INSURANCE COMPANY

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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

1 DAN Carlton, an individual,  
2 Plaintiff,  
3 v.  
4 AMGUARD INSURANCE COMPANY, a  
5 foreign corporation; and  
6 DOES 1 to 100, inclusive,  
7 Defendants.

**Case No. 2:22-cv-02030-WBS-DB**

**AMENDED STIPULATION AND ORDER TO  
EXTEND DISCOVERY, PRETRIAL DATES  
AND TRIAL DATE SET IN STATUS  
(PRETRIAL SCHEDULING) ORDER**

Plaintiff Dan Carlton ("Plaintiff") and Defendant Amgard Insurance Company ("Defendant") by and through their respective counsel, hereby stipulate and request the Court to approve their agreement for an extension of the discovery, other pretrial deadlines and trial date as follows by approximately 60 days:

1. On March 3, 2023, the Court issued a Status (Pretrial Scheduling) Conference and trial [Dkt. 7].

2. Good cause exists for the parties' request because the parties would like to engage in both informal settlement discussions and a possible mediation to attempt to resolve this matter before engaging in further discovery. The parties have

1 completed disclosures, and plaintiff's counsel has noticed the  
2 depositions of multiple home office employees of the defendant.

3       3. In light of the settlement discussions, the discovery  
4 to be completed and possible dispositive motions, the parties  
5 jointly request that the Court extend the deadlines and dates as  
6 proposed below:

<b>Deadline</b>	<b>Current Date</b>	<b>Proposed New Date</b>
Expert disclosures due	September 5, 2023	November 6, 2023
Rebuttal expert disclosures	September 27, 2023	November 27, 2023
Close of factual discovery	October 17, 2023	December 18, 2023
Last day to file motions	November 13, 2023	February 13, 2024
Final Pretrial Conference	January 29, 2024, 1:30 p.m.	<b>April 22, 2024, 1:30 p.m.</b>
Trial Date	March 26, 2024, 9 a.m.	<b>June 25, 2024, 9:00 a.m.</b>

16       4. Accordingly, the parties stipulate and respectfully  
17 request that the Court extend the deadlines as proposed, or  
18 alternative dates convenient for the Court.

Dated: August 2, 2023

WILSON, ELSE, MOSKOWITZ,  
FEDERMAN & DICKER LLP

/s/

By: JOHN H. PODESTA  
LINDA B. OLIVER  
Attorneys for Defendant  
AMGUARD INSURANCE COMPANY

1 Dated: August 2, 2023

2 MURPHY AUSTIN ADAMS SCHOENFELD LLP

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4 By \_\_\_\_\_

5 ALEXANDER F. STUART  
6 Attorneys for Plaintiff  
7 DAN CARLTON

8 **ORDER**

9 After considering the stipulation, IT IS HEREBY ORDERED  
10 THAT:

11 1. For good cause shown, the stipulation is granted;  
12 2. The discovery, motion, pretrial and trial dates are  
13 continued as follows:

14 Expert disclosures due: November 16, 2023

15 Rebuttal expert disclosures due: November 27, 2023

16 Close of factual discovery: December 18, 2023

17 Last day for filing motions: February 13, 2024

18 Final Pretrial Conference: **April 22, 2024, 1:30 p.m.**

19 Trial date: **June 25, 2024, 9:00 a.m.**

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21 Dated: August 3, 2023

  
22 WILLIAM B. SHUBB  
23 UNITED STATES DISTRICT JUDGE

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